

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,
INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DECLARATION OF ROBERT C. GILL IN SUPPORT
OF DEFENDANTS' MOTION IN LIMINE TO EXCLUDE EVIDENCE
OF DOCUMENTS AND MATERIALS ALLEGEDLY TAKEN BY FORMER VGT EMPLOYEES**

1. I am an attorney at Saul, Ewing, Arnstein & Lehr LLP, counsel for Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill"). I was admitted *pro hac vice* in this matter on October 27, 2017.

2. Attached as **Exhibit A** is a true and correct copy of certain excerpts of Plaintiff's Sixth Supplemental Objections and Responses to Defendant Castle Hill Studio LLC's First Set of Interrogatories (Nos. 1-13).

3. Attached as **Exhibit B** is a true and correct copy of certain excerpts of Defendants' Second Amended Responses to Plaintiff's First Set of Requests for Admission.

4. Attached as **Exhibit C** is a true and correct copy of certain excerpts of the deposition of Aaron Milligan.

5. Attached as **Exhibit D** is a true and correct copy of certain excerpts of the deposition of Paul Suggs.

6. Attached as **Exhibit E** is a true and correct copy of certain excerpts of the deposition of Rich Sisson.

7. Attached as **Exhibit F** is a true and correct copy of a document produced by Castle Hill bearing Bates range CHG0124577-81.

8. Attached as **Exhibit G** is a true and correct copy of certain excerpts of the deposition of Brandon Booker.

9. Attached as **Exhibit H** is a true and correct copy of a document produced by Castle Hill bearing Bates range CHG0126328-29.

10. Attached as **Exhibit I** is a true and correct copy of a document produced by Castle Hill bearing Bates range CHG0124581-82.

11. Attached as **Exhibit J** is a true and correct copy of certain excerpts of the deposition of Seth Morgan.

12. Attached as **Exhibit K** is a true and correct copy of a document produced by Castle Hill bearing Bates number CHG0044794.

13. Attached as **Exhibit L** is a true and correct copy of certain excerpts of the deposition of Jason Sprinkle.

14. Attached as **Exhibit M** is a true and correct copy of a document produced by Castle Hill bearing Bates range CHG0019196-97.

15. Attached as **Exhibit N** is a true and correct copy of certain excerpts of the deposition of Jason Sprinkle, Volume II.

16. Attached as **Exhibit O** is a true and correct copy of certain excerpts of the deposition of Stacy Friedman.

17. Attached as **Exhibit P** is a true and correct copy of a June 4, 2018 Email from P. Swanson to R. Gill.

18. Attached as **Exhibit Q** is a true and correct copy of the Reply Expert Report of Stacy Friedman (without exhibits).

19. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 12, 2018 in Washington, District of Columbia.

/s/ Robert C. Gill
Robert C. Gill

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of October, 2018, I caused a copy of the foregoing Declaration to be served on the following counsel for Plaintiff who have consented to email service, via email:

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